Special Agent:

Ross, ATF

Telephone: (810) 341-5710

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America
V.
Eric D. Coffee

Case: 4:24-mj-30014 Assigned To: Ivy, Curtis, Jr Assign. Date: 1/17/2024 Description: IN RE SEALED

MATTER (kcm)

CRIMINAL COMPLAINT

On or about the date(s) of		Dece	ember 12, 2023	in the county of	Genesee	in the	
Eastern	District of	Michigan	, the defendant	t(s) violated:			
Code Section				Offense Description			
18 U.S.C. § 922 (j)		Possession of stolen firearms					
	minal complaint is b	ased on these	facts:				
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				Complainant's	signature		
			Stepl	nen Ross, Special Agent, ATF			
			Stepl	nen Ross, Special Agent, ATF Printed name			
	and signed in my presenteans.	nce and/or by	<u>Stepl</u>				
Sworn to before me eliable electronic m Date: <u>January 17,</u>	neans.	nce and/or by	Stepl		and title		

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT United States v. Eric Coffee

- I, Stephen N. Ross, being duly sworn, hereby depose and state as follows:
- 1. I have been employed as a special agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), United States Department of Justice, since September 2015, and am currently assigned to the Flint Field Office. I am a graduate of the Criminal Investigator Training Program and the ATF Special Agent Basic Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. During my employment as a federal law enforcement officer, I have conducted and participated in numerous criminal investigations focused on illegal firearms and armed drug trafficking violations.
- 2. The facts in this affidavit come from my personal knowledge, knowledge obtained during my participation in this investigation from other individuals including other law enforcement officers, as well as my review of reports and computer records related to this investigation, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of a criminal complaint, it does not set forth each and every fact that I or others have learned during the course of this investigation.

- 3. Based on my training and experience, and the facts as set forth in this affidavit, there is probable cause to believe that Eric Coffee has violated Title 18, United States Code Section 922(j), possession of a stolen firearm.
- 4. On December 12, 2023, Detective Nathan Greene (U.C. Green), a member of the Flint Area Narcotics Group (FANG,) acting in an undercover capacity, purchased two stolen firearms from Eric Coffee for \$1,800.
- 5. On that date, U.C. Greene drove to a pre-determined location in Flint Michigan to meet with Coffee to purchase two firearms. After arriving at the pre-determined meet location, Coffee sold two firearms to U.C. Green.
- 6. The two firearms sold by Coffee to U.C. Green included a CNK, 9mm, semi-automatic pistol and a Glock, model 19, 9mm semi-automatic pistol.
- 7. On the date Coffee sold the firearms to U.C. Green, I conducted a check in the Michigan Law Enforcement Information Network and confirmed that both of the pistols were reported stolen.
- 8. After the purchased was conducted, Coffee told an ATF confidential source that the firearms he sold to U.C. Greene were "hot". Based on my training and experience, a "hot gun" is a term commonly used to refer to a stolen firearm.
- 9. Later in December 2023, the ATF confidential source indicated that Coffee texted them to inform them that he had additional firearms for sale, but they were "hot."

10. I have been familiar with the ATF source of information for 1 month

and the source of information has worked with local law enforcement agencies for

the past year and has never provided unreliable information. Additionally, the

source of information is assisting law enforcement in hopes of having state charges

reduced.

11. According to Special Agent Dustin Hurt, an Interstate Nexus Expert,

the firearms sold by Coffee to U.C. Green were not manufactured in the state of

Michigan.

12. For these reasons, I believe there exists probable cause to charge Eric

Coffee with violation of Title 18, United States Code Section 922(j), being a person

being in possession of stolen firearm.

Stephen N. Ross, Affiant

Special Agent

Bureau of Alcohol, Tobacco, Firearms & Explosives

Sworn to before me and signed in my presence and/or by reliable electronic means on January 17, 2024.

Hon. Curtis Ivy, Jr.

United States Magistrate Judge